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6 Attorney for Ronald Harris

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 RONALD HARRIS,

14 Defendant.

Case No. 2:09-cr-223-GMN-LRL

**STIPULATION TO CONTINUE**  
**REVOCATION HEARING**

(Third Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
17 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the  
18 United States of America, and Rene L. Valladares, Federal Public Defender, and  
19 Monique Kirtley, Assistant Federal Public Defender, counsel for Ronald Harris, that the  
20 Revocation Hearing currently scheduled on November 17, 2016, be vacated and continued to a  
21 date and time convenient to the Court, but no earlier than forty-five (45) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defendant is in custody and does not oppose the continuance.
- 24 2. On January 19, 2016, Mr. Harris was indicted for possession with intent to
- 25 distribute, in case number 2:16-cr-014-GMN-CWH.
- 26

1           3.       On May 25, 2016, a motion to suppress was filed in case number 2:16-cr-014-  
2 GMN-CWH. An evidentiary, on the motion to suppress, was conducted on May 25, 2016. On  
3 June 30, 2016, the Magistrate Judge entered a Report and Recommendation. (CR#17). On  
4 November 14, 2016 this Court adopted the Magistrate Judge's Report and Recommendation.

5           4.       The revocation hearing on case 2:09-cr-223-GMN-LRL is currently scheduled  
6 for November 17, 2016. The trial in case 2:16-cr-014-GMN-CWH is currently scheduled for  
7 December 19, 2016. The revocation petition is inextricably linked to case 2:16-cr-014-GMN-  
8 CWH. The criminal indictment and the revocation petition allege the same criminal conduct.

9           5.       Additionally, the parties are negotiating a resolution for both cases.

10          6.       The additional time requested herein is not sought for purposes of delay, but  
11 merely to allow for the complete resolution of the trial in 2:16-cr-GMN-CWH prior to the  
12 hearing on the revocation petition.

13               This is the third request for a continuance of the revocation hearing.

14               DATED this 15<sup>th</sup> day of November, 2016.

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16       RENE L. VALLADARES  
17       Federal Public Defender

16       DANIEL G. BOGDEN  
17       United States Attorney

18       /s/ Monique Kirtley  
19       By \_\_\_\_\_

18       /s/ Robert Knief  
19       By \_\_\_\_\_

20       MONIQUE KIRTLEY  
21       Assistant Federal Public Defender

20       ROBERT KNIEF  
21       Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RONALD HARRIS,

7 Defendant.

Case No. 2:09-cr-223-GMN-LRL

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 Thursday, November 17, 2016 at 9:30 a.m., be vacated and continued to January 12, 2017 at  
12 the hour of 11:00 a.m.; or to a time and date convenient to the court.

13 DATED this 16 day of November, 2016.

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16 UNITED STATES DISTRICT JUDGE  
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